

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	<b>No. 4:21-CR-5-O</b>
THE BOEING COMPANY,	)	
	)	
<i>Defendant.</i>	)	
	)	

**THE BOEING COMPANY’S RESPONSE IN OPPOSITION TO CERTAIN FAMILIES’  
MOTION FOR COURT TO SET AN *ELLIS* PLEA DEADLINE**

The Boeing Company (“Boeing”), by counsel, respectfully submits this brief response in opposition to the motion filed by certain crash victim families asking the Court to set a May 5, 2025 *Ellis* plea deadline. ECF No. 298; *see* ECF Nos. 299, 300 (joinder motions filed by certain other crash-victim families); *see also* ECF No. 301 (United States of America’s (“Government’s”) opposition to ECF Nos. 298-300 (“Gov’t Opp.”)). Boeing joins the Government’s observation that “the CVRA and case law do not require[] modifying the Court’s considered Scheduling Order.” *See* Gov’t Opp. at 4. Like the Government, Boeing also “appreciates the logistical challenges international travel can present and the desire to know with certainty how and when this case will resolve. . . .” *Id.* But the Court, having considered the matter, has set a trial date of June 23rd, which all parties are on notice of and have been on notice of since March 25th. ECF No. 293. *Ellis* does not support the proposition that the Court is now required, or encouraged, to retroactively modify its own considered Scheduling Order or otherwise impose an artificial deadline on parties’ ongoing discussions about a pretrial resolution. Boeing therefore joins the Government in respectfully opposing the motion to set an *Ellis* deadline.

Dated: April 28, 2025

Respectfully submitted,

s/ Mark Filip

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 28, 2025, the foregoing was filed with the Clerk of the United States District Court for the Northern District of Texas using the CM/ECF system. The system will serve counsel of record.

/s/ Mark Filip  
Mark Filip